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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 GARY QUAINANCE, an individual,  
13 Plaintiff,

14 vs.

15 HERB HALLMAN CHEVROLET, INC.  
16 dba CHAMPION CHEVROLET,  
17 Defendant.

CASE NO: 3:20-CV-00084-MMD-WGC

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT'S MOTION TO COMPEL  
ARBITRATION; IN THE ALTERNATIVE,  
MOTION TO DISMISS  
(First Request)**

18 COMES NOW, Plaintiff GARY QUAINANCE (hereinafter, "Plaintiff"), by and  
19 through his attorney of record Trevor J. Hatfield, Esq. of the law firm of Hatfield & Associates,  
20 Ltd., and HERB HALLMAN CHEVROLET, INC. dba CHAMPION CHEVROLET (hereinafter  
21 "Defendant"), by and through its attorney of record Shannon S. Pierce, Esq., of the law firm of  
22 Fennemore Craig, P.C. and do hereby stipulate and agree to an extension of time for Plaintiff to  
23 respond to Defendant's Motion to Compel Arbitration; in the Alternative, Motion to Dismiss  
24 (First Request) (ECF #14).

25 This extension is requested due to Plaintiff's counsel having a need for additional time  
26 and Defendant has courteously granted this extension of time to file Plaintiff's response.  
27  
28

This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' first request for an extension of the time for the parties to respond to this motion.

Accordingly, Plaintiff's shall have up to and including May 29, 2020 to respond to Defendant's Motion to Compel Arbitration; in the Alternative Motion to Dismiss.

Dated this 27<sup>th</sup> day of May 2020.

Dated this 27<sup>th</sup> day of May 2020.

HATFIELD & ASSOCIATES, LTD.

FENNEMORE CRAIG, P.C.

By: /s/ Trevor J. Hatfield  
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*Attorneys for Defendant*

Dated this 27<sup>th</sup> day of May, 2020

Dated this 27<sup>th</sup> day of May, 2020

OLDENBURG LAW OFFICE

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*Attorney for Defendant*

**IT IS SO ORDERED.**



MIRANDA M. DU  
UNITED STATES DISTRICT JUDGE

DATED THIS 29<sup>th</sup> day of May 2020.